

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

MARTONE & UHLMANN, P.C.

Dennis P. Uhlmann, Jr., Esq.

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(973) 473-3000

Attorney for Creditor/Servicing Agent

PNC MORTGAGE

36.8802

In re:

PATRICIA A. MROZ

Case No. 25-12807

Judge: Christine M. Gravelle

Chapter 13

**OBJECTION TO CONFIRMATION BY SECURED CREDITOR**  
**CONFIRMATION HEARING DATE: May 21, 2025 - 10:00 AM**

On behalf of PNC MORTGAGE, Secured Creditor of a mortgage on debtor(s)' property, 193 S. FULTON STREET, WOODBRIDGE, NEW JERSEY 07095, MARTONE & UHLMANN, P.C., hereby objects to the confirmation of debtor(s)' proposed plan for the following:

1. The bar date for filing Proofs of Claim is MAY 27, 2025. Secured Creditor has not yet filed its Proof of Claim, but anticipates doing so shortly. Secured Creditor reserves the right to amend this Objection to Confirmation, and estimates the arrears owed at. \$34,499.72.
2. According to Debtor's proposed Chapter 13 Plan, Secured Creditor is to be paid \$28,000.00 over five (5) years.
3. The Debtor's Schedules I and J indicate an excess income of \$613.00. The debtor(s) cannot afford to pay this Secured Creditor's Proof of Claim and the Proof of Claim(s) of the other Secured Creditor(s) over a five (5) year plan.
4. Such a plan leaves the Secured Creditor inadequately protected in that its claim will not be fully satisfied.

5. It is for the foregoing reasons that attorney for the Secured Creditor respectfully objects to the Confirmation of the debtor's Chapter 13.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge, information and belief. I am aware that if any of the foregoing statements made by me are willfully false I am subject to punishment.

By: /s/Dennis P. Uhlmann, Jr.  
Dennis P. Uhlmann, Jr., Esq.  
A Member of the Firm

Dated: 4/28/25

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

MARTONE & UHLMANN

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PNC BANK, NATIONAL ASSOCIATION

36.8802

Case No. 25-12807

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In re:

Hon. Judge Christine M. Gravelle

Patricia A. Mroz

**CERTIFICATION OF SERVICE**

1. I, Melissa Uhlmann am the Legal Assistant for Dennis P. Uhlmann, Jr., Esq., who represents PNC BANK, NATIONAL ASSOCIATION in the above captioned matter.
2. On April 28, 2025, I sent a copy of the following pleadings and/or documents to the parties listed in the chart:

Notice of Appearance

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

/s/Melissa Uhlmann

Melissa Uhlmann

Dated: April 28, 2025

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Patricia A. Mroz 193 FULTON STREET WOODBIDGE, NJ 07095	Debtor(s)	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Greenberg, Andrew G. Andrew G. Greenberg, Esq. Greenberg & Cioci 530 Highway 18 E. Brunswick, NJ 08816	Debtor(s) Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Albert Russo, Esq. Russo, Albert Cn 4853 Trenton, NJ 08650	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)

\*May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.